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Application **granted in part**. The deadline for **all** Defendants to answer or otherwise respond to the Complaint is extended to **April 28, 2023**. The request to adjourn the initial pretrial conference is **denied**. The Court does not typically adjourn the initial pretrial conference pending the filing of an answer or other response to the Complaint.

March 17, 2023

VIA ECF

Hon. Lorna G. Schofield
United States District Judge
United States District Court for the Southern District of New York
500 Pearl St.
New York, NY 10007

Dated: March 20, 2023
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Greenberg v. TelevisaUnivision, Inc. et al., No. 1:23-cv-00189-LGS

Dear Judge Schofield:

We represent Defendant TelevisaUnivision, Inc. ("TU") in the above-referenced matter. We submit this letter motion to respectfully request: (i) an extension of TU's time to answer or otherwise respond to Plaintiff Wazel Jane Greenberg's ("Plaintiff") Complaint in this action from March 29, 2023 to April 28, 2023; and (ii) adjournment of the initial conference currently scheduled for April 19, 2023 to a date that is not earlier than May 19, 2023. This is TU's first motion for an extension of time to answer or otherwise respond to the Complaint, and it is also TU's first motion to adjourn the initial conference in this matter. Plaintiff consents to the foregoing requests.

A brief extension of TU's time to answer or otherwise respond to the Complaint, as well as a brief adjournment of the initial conference, is necessary because our firm has only recently been retained in this matter. While TU has worked diligently to investigate the facts underlying Plaintiff's Complaint in order to provide a complete and accurate response, we require additional time to gather relevant documents, interview necessary witnesses, and adequately assess Plaintiff's allegations. The requested extension and adjournment will allow TU the necessary time to conduct an investigation of Plaintiff's claims, and TU does not anticipate that it will require any further revision of the foregoing deadlines.

To the extent that Your Honor has any questions regarding the foregoing request, we will be happy to discuss the same. Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ Jonathan Stoler

Jonathan Stoler
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: Counsel of Record